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TTMA

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September 2, 1999

Docket Management, Room PL-40 1
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, D.C. 20590

Subject: Truck Splash & Spray, Docket NHTSA-99-5 10 1-13

Dear Sir or Madam:

We recommend that DOT develop a criteria with which to judge splash and spray suppression devices or systems. The spray supression devices or systems should:

(1) Reduce spray by some specified measurable value under typical side winds.

(2) Be capable of operating in mud, tar, ice, and snow conditions.

(3) Not increase brake and tire heat buildup especially during downhill braking.

(4) Allow the ease of inspection and maintenance of tires and brakes.

(5) Allow ease of installation on sliding suspensions and specialty vehicles such as lowbed, pole and container chassis trailers.

(6) Not increase the overall vehicle width by more than 6 inches.

(7) Not cost more than $X per wheel.

(8) Not weigh more than X pounds per wheel.

(9) Not exceed $X per wheel per year for maintenance, repair, and replacement.

While some devices and systems may be able to significantly reduce spray on some vehicles under some environmental conditions, they may not be capable of this for most vehicles under most environmental conditions.

One means of reducing spray for all types of vehicles is by means of highway construction. Porous surface highways have been shown to reduce spray significantly at least while the surfaces are relatively new.

Yours truly,

Donald W. Vierimaa

Donald W. Vierimaa
Vice President-Engineering

DWV/mm

cc: TTMA Engineering Committee
Tank Conference Engineering Committee
Air Deflector Associates